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September 17, 1999

RANDALL W. SIFERS  
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VIA HAND DELIVERY

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, DC 20554

RECEIVED  
SEP 17 1999  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

Re: MM Docket No. 99-153;  
File Nos. BRCT-940407KF and BPCT-940630KG

Dear Madam Secretary:

Transmitted herewith, on behalf of Reading Broadcasting, Inc., is an original and six copies of its Response and Objections of Reading Broadcasting, Inc. to Adams' Third Set of Document Requests in the above-referenced docket.

An extra copy of the response is enclosed. Please date-stamp the extra copy and return it to the courier for return to me.

Should there be any questions, please communicate with the undersigned.

Very truly yours,

HOLLAND & KNIGHT LLP

*Randall W. Sifers*

Randall W. Sifers

Enclosures

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ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In re Applications of	)	MM Docket No. 99-153
	)	
READING BROADCASTING, INC.	)	File No. BRCT-940407KF
	)	
For Renewal of License of	)	
Station WTVE(TV), Channel 51	)	
Reading, Pennsylvania	)	
	)	
and	)	
	)	
ADAMS COMMUNICATIONS	)	File No. BPCT-940630KG
CORPORATION	)	
	)	
For Construction Permit	)	

To: Administrative Law Judge Richard L. Sippel

**RESPONSE AND OBJECTIONS**  
**OF READING BROADCASTING, INC.**  
**TO ADAMS' THIRD SET OF DOCUMENT REQUESTS**

1. Pursuant to Section 1.325 of the Commission's Rules, Reading Broadcasting, Inc. ("Reading"), by its attorneys, hereby submits the following objections and responses to Adams' *Third Set of Document Requests* ("Third Request") served on Reading by Adams Communications Corporation ("Adams") on September 13, 1999.
2. REQUEST NO. 1: Minutes and documents referred to in or attached to minutes of meetings of the Board of Directors, Executive Committee, Stockholders and/or any other governance meetings of RBI during the period August 1, 1989 to August 1, 1994 (the "license term").

3. RESPONSE: To the extent that the category of documents requested relates to issues other than programming, Reading objects to Request No. 1 on the grounds that such documents are irrelevant to any designated issue herein. Reading already has produced thousands of pages of documents pursuant to Adams' prior requests for documents related to programming. To the extent that such documents relate to the station's programming and are within the scope of Adams' prior requests for documents, Reading will produce the requested documents, subject to any privilege claim.

4. REQUEST NO. 2: Documents regarding finances of RBI relevant to the contention that the program operations of WTVE during the early part of the license term were adversely impacted by the financial condition of the station, including documents that reflect income and expenses both during the early part of the license term and during the subsequent part of the license term.

5. RESPONSE: Reading objects to Request No. 2 on the grounds that the scope of requested financial information is so overbroad to be unduly burdensome and so vaguely worded that it would include documents irrelevant to any designated issue herein. The Commission analyzes a station's performance over the license term, and the station's record, documented in the thousands of pages of documents previously produced by Reading, speaks for itself. It is a matter of record that the company went into and came out of bankruptcy during the 1989-94 license term period. Reading does not object to deposition inquiries that will provide some context for the station's performance from 1989-94, but Adams' document request is completely unnecessary and objectionable.

6. REQUEST NO. 3: Documents in the possession or under the control of RBI and/or Mr. Parker regarding the “broadcast experience” identified in RBI’s motion filed September 3, 1999 and any other “broadcast experience” of Mr. Parker on which RBI intends to rely.

7. RESPONSE: Reading objects to Request No. 3 on the grounds that it would be unduly burdensome to produce any and all documents regarding Mr. Parker’s broadcast experience. Reading is willing to provide representative documents that relate to Mr. Parker’s broadcast experience, as contemplated by Section 1.325(c)(1)(x) of the Commission’s rules.

8. REQUEST NO. 4: Documents in the possession or under the control of RBI and/or Mr. Linton regarding the “broadcast experience” identified in RBI’s motion filed September 3, 1999 and any other “broadcast experience” of Mr. Linton on which RBI intends to rely.

9. RESPONSE: Reading objects to Request No. 4 on the grounds that it would be unduly burdensome to produce any and all documents regarding Mr. Linton’s broadcast experience. Reading is willing to provide representative documents that relate to Mr. Linton’s broadcast experience, as contemplated by Section 1.325(c)(1)(x) of the Commission’s rules.

10. REQUEST NO. 5: Documents in the possession or under the control of RBI and/or Mr. McCracken regarding the “broadcast experience” identified in RBI’s motion filed September 3, 1999 and any other “broadcast experience” of Mr. McCracken on which RBI intends to rely.

11. RESPONSE: Reading objects to Request No. 5 on the grounds that it would be unduly burdensome to produce any and all documents regarding Mr. McCracken’s broadcast experience. Reading is willing to provide representative

documents that relate to Mr. McCracken's broadcast experience, as contemplated by Section 1.325(c)(1)(x) of the Commission's rules.

12. REQUEST NO. 6: Documents regarding the "broadcast experience" of any other principal of RBI, on which RBI intends to rely, that are in the possession or under the control of RBI and/or the subject principal.

13. RESPONSE: No such documents exist.

Respectfully submitted,  
READING BROADCASTING, INC.

By: Randall W. Sifers

Thomas J. Hutton  
Randall W. Sifers

Its Attorneys

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September 17, 1999

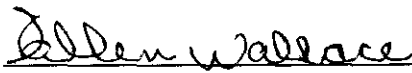
## CERTIFICATE OF SERVICE

I, Ellen Wallace, a secretary in the law firm of Holland & Knight, LLP, do hereby certify that on September 17, 1999, a copy of the foregoing RESPONSE AND OBJECTIONS OF READING BROADCASTING, INC. TO ADAMS' THIRD SET OF DOCUMENT REQUESTS was delivered by hand to the following:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 1-C864  
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Mass Media Bureau  
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